

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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CATELIN CLOBES,

Plaintiff,

vs.

NBCUNIVERSAL MEDIA, LLC,  
BRANDY ZADROZNY, and ALIZA  
NADI,

Defendants.

Civil Action No.  
21-cv-02117-PJS-JFD

DECLARATION OF LEITA  
WALKER IN SUPPORT OF  
MOTION TO DISMISS  
PLAINTIFF'S SECOND AMENDED  
COMPLAINT BY NBCUNIVERSAL  
MEDIA, LLC

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I, Leita Walker, hereby declare, under penalty of perjury as follows:

1. I am a partner at Ballard Spahr, LLP, 2000 IDS Center, 80 South Eighth Street, Minneapolis, Minnesota 55402. I am licensed to practice law in the State of Minnesota and am admitted to practice before this Court. I am counsel for Defendant NBCUniversal Media, LLC. I have personal knowledge of the facts stated in this declaration, and if sworn as a witness, I am competent to testify to them.

2. Attached hereto as **Exhibit A** is a true and correct copy of NBC's news report, "*How anti-vaxxers target grieving moms and turn them into crusaders against vaccines*," which the plaintiff claims defamed her. Plaintiff references this news report throughout her Complaint, including in Paragraph 2.

3. Attached hereto as **Exhibit B** is a true and correct copy of the State of Minnesota's incorporation records for "Justice for Eeve Organization," which lists the plaintiff as a registered agent.

4. Attached hereto as **Exhibit C** is a true and correct copy of a June 26, 2019 letter from A. Quinn Strobl, M.D., Wright County Medical Examiner, to the plaintiff.

5. Attached hereto as **Exhibit D** is a true and correct copy of a report by the Wright County Sheriff's Office of the investigation of the death of Evee Clobes.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

**Dated: April 27, 2022**

/s/ Leita Walker